

**AGENDA**  
**Meeting on L.E. Carpenter**  
**At USEPA Region II Offices**  
**Edison, NJ**  
**September 19, 2002**

**I. Objectives of Meeting:**

- Verify approval of Conceptual Free-Product Remedial approach and initiation of a Remedial Action Plan (RAP).
- Verify approval to move forward with a Focused Feasibility Study (FFS) on Lead contaminated soils to support a change in the ROD via an Explanation of Significant Difference (ESD), and integration of a selected alternative on soil Lead with the Free-Product RAP.
- Resolve issues related to agency comments on the Lead and Free-Product Reports via the following discussions.

**II. A Brief Summary of Recent Lead and Free-Product Activities (2000-2002)**

- How LEC got from the ROD-required free-product recovery system to a decision to robustly remove the free-product source.
- Why lead contamination was further investigated and why actions related to it need to be integrated into the free-product remediation program.

**III. Technical Discussions as they relate to key Agency comments and concerns on the Free-Product and Lead Reports.**

**A. Conceptual Hydrogeologic Site Model**

- Stratigraphy - Geologic strata , waste zones, boulder problems
- Groundwater - levels, fluctuations, flows, control limitations

**B. Product Extent and Removal Issues**

- Free Product Zone - Estimated Extent, Modeled extent
- Composition of product
- Distribution and particle retention
- Groundwater control

**C. Lead Identification, Distribution and Removal Issues**

- Attributed source identification
- Method of investigation, XRF/visual
- Horizontal and vertical distribution



- Geochemistry, mobility and groundwater

#### **D. Combined Remediation Approach**

- Lead contaminated soil identification, excavation and disposition
- Free product removal volumes, control and disposition

#### **E. Human and Ecological Risk Discussions**

- Previous Findings
- Flood Plain and construction Issues
- MNA
- End Use Plans and Restrictions

#### **IV. Other Discussions and Comments**

#### **V. Follow-up Activities**

***Note : The attached table can be used as a cross reference of the discussions outlined in this agenda to the specific comments from USEPA and NJDEP. The discussions should provide response to most of the comments.***

## KEY TO DISCUSSIONS ON COMMENTS

I. Responses to Specific Comments (NJDEP) – Nature and Extent of lead in soils and groundwater	A. Conceptual Site Model	B. Product Issues	C. Lead Issues	D. Remedial Approach	E. Risk
1. Comment No. 1, regarding hot spot soil disposition:					
2. Comment No. 2 regarding ecological risk assessments:					
3. Comment No. 3 regarding Lateral extent of lead:					
4. Comment No. 4 regarding the process waste seam:					
5. Comment No. 5 Regarding lead clean-up criteria:					
6. Comment No. 6 regarding wetlands analyses and delineation:					
II. Responses to Specific Comments (USEPA) - Nature and Extent of lead in soils and groundwater					
1. Comment No. 1 regarding site geochemistry and leaching tests					
2. Comment No. 2 regarding groundwater elevations:					
3. Comment No. 3 Regarding the lead clean-up goal:					
4. Comment No. 4 regarding ecological risks:					
5. Comment No. 5 regarding cadmium and other metals:					
6. Comment No. 6 regarding TCLP results:					
7. Comment No. 7 regarding SPLP results:					
8. Comment No. 8 regarding field parameters:					
9. Comment No. 9 regarding well WP-A2:					
10. Comment No. 10 Regarding SS-47:					
11. Comment No. 11 Regarding WDA-PES-6:					
12. Comment No. 12 regarding isotope ratios:					
13. Comment No. 13 regarding ecological risk assessment:					
14. Comment No. 14 regarding XRF calibration:					
15. Comment No. 15 regarding test pit sampling:					
16. Comment No. 16 regarding bullets on Section 3					
17. Comment No. 17 regarding cadmium:					
18. Comment No. 18 regarding TCLP results:					
19. Comment No. 19 regarding analytical procedures					
20. Comment No. 20 regarding ores:					
21. Comment No. 21 regarding crocoite:					
22. Comment No. 22 regarding xylene:					
23. Comment No. 23 regarding site use:					

24. Comment No. 24 regarding lead cleanup standards:					
25. Comment No. 25 regarding groundwater contaminant pathway:					
26. Comment No. 26 regarding wetlands on Figure 2:					
27. Comment No. 27 regarding the former waste disposal area on Figure 2:					
28. Comment No. 28 regarding delineation of contaminated areas on Figure 2:					
29. Comment No. 29 regarding intermediate sample depths:					
30. Comment No. 30 regarding the legend					
<b>III. Responses To Specific Comments (njdep) – findings and recommendations regarding a conceptual free-product remediation strategy</b>					
Comment No. 1, para. 1 regarding free-product removal volumes:					
Comment No. 1, para 2 and USEPA Comment No. 1 regarding LTDD:					
Comment No. 2 regarding Groundwater and Surface Water Controls:					
Comment No. 3 regarding washing of the larger-sized fraction					
Comment No. 4 regarding groundwater treatment:					
Comment No. 5 regarding product squeezing:					
Comment No. 6 regarding in situ thermal desorption:					
Comment No. 6 regarding depth of excavation below water:					
Comment No. 7 regarding backfilling of lead-contaminated soils:					
Comment No. 8 regarding recovery of free product:					
<b>IV. Responses To Specific Comments (USEPA) – findings and recommendations regarding a conceptual free-product remediation strategy</b>					
Comment No. 1 Regarding LTDD and alternatives analysis:					
Comment No. 2 regarding cleaning of cobbles and boulders:					
Comment No. 3 regarding limits of excavation:					
Comment No. 4 regarding cross-sectional presentations					

**Relation of Particle Diameter  
to its Surface/Volume Ratio**

